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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PATRICIA A. MARTONE, :
Plaintiff, : Civil Action No.:
vs. : 11-civ-1990 (JGK)
Defendant. : ECF Case
: FILED UNDER SEAL
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**REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

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PRELIMINARY STATEMENT

When the record is stripped of Plaintiff's speculation, irrelevancies and conclusory remarks, what remains establishes unequivocally that: (i) Plaintiff was terminated for valid and well-documented reasons; (ii) no triable issue of gender or age bias has been raised; (iii) there is no evidence that Plaintiff was terminated because she complained of discrimination; (iv) she does not oppose dismissal of her claim for additional 2010 compensation; and (v) there is no evidence that the Firm terminated her to deprive her of retirement benefits. Plaintiff's claims should therefore be dismissed.¹

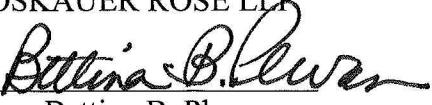
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CONCLUSION

For all the foregoing reasons, Defendant's motion for summary judgment dismissing Plaintiff's claims in their entirety should be granted in all respects.

Dated: October 15, 2012

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By: 
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